

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTINE ACKERMAN

Chapter 13

ARLENE SCHEIRER

Bankruptcy Court No. 17-00456-JJT

Debtor

DEBTOR'S OBJECTION TO MOTION TO DISMISS

1. The Debtor, Christine Ackerman, by and through counsel, John R. Caffese, now makes her objection to the Trustee's motion to dismiss.
2. The Trustee has moved to dismiss the Debtor's case for failure to file an amended and confirmable plan after the Debtor's plan confirmation was denied on June 30.
3. The Debtor's husband unexpectedly passed in July of 2017.
4. Debtor's family is gathering resources to contribute to amend schedules and plan payment in a workable fashion.
5. Debtor will have a new plan filed before the dismissal hearing on October 17, 2017.
6. Debtor will amend any schedules as necessary to reflect the income and asset changes due to her deceased husband.

WHEREFORE, The Debtor, Christine Ackerman, respectfully requests that the Trustee's Motion to Dismiss not be granted.

Respectfully Submitted,

/s/ John R. Caffese, Esq.

September 11, 2017

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CERTIFICATE OF SERVICE

I, John R. Caffese, Esq., counsel for Christine Ackerman, certify that on September 11, 2017 I served Debtor's Objection to the Trustee's Motion to Dismiss on the following party via ECF System:

Agatha R. McHale, Esq.
Attorney for Trustee
Charles J. DeHart, III
Standing Chapter 13 Trustee
Ste. A, 8125 Adams Drive
Hummelstown, PA 17036
717-566-60-97

/s/ John R. Caffese, Esq.
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